

GAMAGE & GAMAGE
William H. Gamage, Esq.
Nevada Bar No. 009024
1775 Village Center Circle., Suite 190
Las Vegas, Nevada 89134
Telephone: (702) 386-9529
Attorneys for Defendant Benjamin Galecki

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA

Plaintiff,

vs.

BENJAMIN GALECKI, et al.

Defendant.

CASE NO. : 2:15-cr-00285-KJD-PAL-2

**UNOPPOSED MOTION TO EXTEND
PRE-TRIAL MOTIONS DEADLINE**

(FIRST REQUEST)

COMES NOW Defendant BENJAMIN GALECKI by and through CJA counsel and hereby timely files this Unopposed Motion to Extend Pre-Trial Motions Deadline (First Request). This Motion is made and based upon the below justification, all papers and pleadings on file herein, along with any oral argument deemed necessary by this court:

1. The current Joint Pretrial Order makes June 15, 2016 the deadline for Defendants to file pre-trial motions.

2. A close family friend and prior legal assistant to Counsel for Benjamin Galecki, passed away suddenly this weekend after her cancer spread. She was admitted to the hospital on or about Friday June 10, 2016 and passed away in the early morning hours of June 12, 2016.

3. This event interrupted Counsel's scheduled time to complete pre-trial motions for the above titled case.

1 4. Counsel endeavored to complete the pre-trial motions but needs
2 additional time.

3 5. Counsel contacted Government counsel who graciously agreed to a
4 seven (7) day extension of time.

6 6. This will allow counsel time to complete the proposed motions, run
7 them by Government counsel for purposes of a 'meet and confer', and then to file
8 same.

9 7. This unopposed request for additional time is brought in good faith and
10 not for purposes of delay or to prejudice any party.

11 Dated this 15th day of June, 2016.

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13 **GAMAGE & GAMAGE**

14 /s/ William Gamage, Esq.

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16 William H. Gamage, Esq.
17 Nevada Bar No. 009024
18 1775 Village Center Circle., Suite 190
19 Las Vegas, Nevada 89134
20 Telephone: (702) 386-9529
21 *Attorneys for Defendant Benjamin Galecki*

22 IT IS SO ORDERED THIS 28th day of June, 2016 that
23 the time for filing Pre-trial is extended for Defendant Benjamin Galecki rendering
24 the following pretrial motions briefing schedule:

25 Pre-Trial Motions - June 22, 2016
26 Response - July 8, 2016
27 Reply - July 18, 2016

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UNITED STATES MAGISTRATE JUDGE